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Ms. Lynn M. Retz  
Secretary to the Commission  
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Re: KCC Docket No. 17-SWBT-158-MIS

Dear Ms. Retz and Mr. Duenes:

I am writing to inform the Commission that AT&T Kansas will not be filing a response to Staff's Update to its July 21, 2017, Response to Additional Commission Questions, which Staff filed on June 25, 2018. Rather, AT&T Kansas will stand on its prior responses to the Commission's questions in its Brief on Additional Questions, filed on July 21, 2017. As AT&T Kansas explained there, the central and only legal question in this proceeding is whether AT&T Kansas has satisfied the standard in 47 U.S.C. § 214(e)(4) for relinquishing its ETC designation in specified areas. The facts show that AT&T Kansas has met that standard, as there are at least two other ETCs in every exchange in the relinquishment area.

Staff, by contrast, focuses instead on what would happen if AT&T Kansas were at some point to discontinue its voice service entirely. That has no relevance to whether AT&T Kansas has satisfied Section 214(e)(4), which is the only issue in this proceeding. Moreover, any concern with that purely hypothetical question is misplaced. As AT&T Kansas' pleadings make clear, after relinquishing its ETC status AT&T Kansas will continue to provide, throughout the relinquishment area, all the same legacy voice services it provides today (albeit without a Lifeline discount). All end-users in those

areas therefore will continue to have access to AT&T Kansas' legacy voice service, as well as the voice service of the remaining ETCs. AT&T Kansas (and other common carriers) could cease providing legacy voice service in those areas only if they first obtained permission from the FCC. AT&T Kansas has not sought such permission, and if it ever does the Commission will have a chance to weigh in at that time. Likewise, nothing in the FCC and D.C. Circuit decisions cited by Staff affects or even relates to the relinquishment standard in Section 214(e)(4) or the facts showing that AT&T Kansas has met that standard.

Because the governing law and dispositive facts remain the same as when AT&T Kansas responded to the Commission's questions in July 2017, no further response is necessary. AT&T Kansas does note, however, that since it and Staff responded to the Commission's questions on July 21, 2017, six more states (Georgia, Florida, Louisiana, Indiana, Texas, and Kentucky) have granted the ETC relinquishment petitions of AT&T ILECs, bringing the total to 14 states. No state has denied an AT&T ILEC ETC relinquishment request.

Sincerely,



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